UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

Transmitted Via Email

January 22, 2014

Ms. Karen Saucier, Ph.D., Director
Remediation Gulf/Southeast
TRC Environmental Corporation
30 Patewood Drive, Suite 300
Greenville, South Carolina 29615

RE: EPA and NJDEP Comments on Additional Wetland Delineation Sampling Results
Dayco/L.E. Carpenter Corporation Superfund Site, Wharton, New Jersey

Dear Ms. Saucier:

EPA and NJDEP have reviewed the results from the additional wetland delineation at the above-referenced site. These results are presented in Progress Report 39, dated September 10, 2013. Although the approved work plan called for the sampling of eight well points, the report indicates that only four well points were successfully sampled due to refusal and/or lack of adequate water at certain locations.

Results from well point location TW-35-5 show 150,000 ppb of DEHP (GWQS-3ppb), 22,000 ppb of ethylbenzene (GWQS-700 ppb), and 130,000 ppb of total xylene (GWQS-1000 ppb); concentrations at other well point locations are lower but still significant. These results confirm the presence of significant groundwater contamination in the wetland area that could be discharging to the Rockaway River.

A work plan to fully delineate and characterize the residual contamination in the wetland (area east of the 2005 Source Reduction Area) should be prepared. The following should be considered during the development of the work plan:

- Continuous borehole profile sampling of both soil and groundwater is needed to fully and accurately delineate the both the lateral and vertical extent of the contaminants.

- Samples must be collected at sufficient depth at each location to clearly demonstrate the bottom elevation of the impacted area(s). Targeted depths for all boring and sampling should be a minimum of 30 feet bgs.

- A contingency for additional step-outs of drilling locations should be included in the work plan.

- Based upon the problems encountered using direct push technology for this area, it is recommended that a more robust drilling technique(s) be employed to ensure that drilling and sampling of all locations can be accomplished, at sufficient depths, regardless of the presence of buried boulders.

- While the use of a peristaltic pump was approved for the initial delineation effort, only groundwater sampling techniques in accordance with NJDEP Technical Regulations will be applicable for the full delineation and characterization work plan.

- Figure 1, submitted as part of Progress Report No. 39 is not an adequate representation of the area or sampling results. The work plan should include confirmation that the sampling results will be reported in cross sectional and surface view maps that are of sufficient scale and detail for focus on the area of concern. The scale used in Figure 1 was insufficient.

- The groundwater analytical results should also be evaluated against the NJDEP's FW2 Surface Water Quality Standards.

Please contact me at 212-637-3865 or at pierre.patricia@epa.gov to schedule a conference call with EPA and NJDEP to discuss the development the work plan.

Sincerely,

Patricia Simmons Pierre
Remedial Project Manager

Cc: Rob Alvey, EPA (via email)
Anthony Cinque, NJDEP (via email)
Ernie Schaub, PolyOne Corporation (via email)